



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

February 9, 1995

Juris Sinats
Environmental Restoration Branch, Code 181
EFA, West
Naval Facilities Engineering Command
900 Commodore Drive
San Bruno, CA 94066-0720

Re: Mare Island Naval Shipyard Preliminary Assessment (PA)
Draft Summary Report, Ordnance Sites, December 1994.

Dear Mr. Sinats:

Enclosed are comments on the above referenced document. The primary change I recommend to this document is to distinguish more specifically between sites that should next be investigated with a site inspection (SI) level of investigation from those that require a remedial investigation (RI) as an IR site (comment 9). I believe there is plenty of evidence to move the sites in the ordnance production area on to a RI type investigation, but that all other sites should either have an SI or there should be a removal action taken. This distinction is important so that we are not prematurely making a commitment to put a lot of investigation resources in sites that do not warrant that effort. In other words, I want to avoid creating sites like IR-22.

If you have any questions regarding this letter, please call me at 415/744-2388.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Huetteman".

Tom Huetteman
Remedial Project Manager

Enclosures

cc: Dick Logar, MINSY
Bob Pender, MINSY
Glenna Clark, EFA West
Chip Gribble, DTSC
Gina Kathuria, RWQCB

Comments on the Draft PA Summary Report for Ordnance Sites

1. Will there be a PA for former dredge ponds that are no longer in use, such as some areas that have been given over to the US Fish and Wildlife Service for management?
2. I strongly suggest that the document include a list of the specific chemical constituents of the ordnance stored, disposed of and manufactured at Mare Island, and a list of chemicals used in the manufacturing process. These lists are necessary to insure that sampling for contamination will cover the complete set of chemicals of potential concern.
3. Please provide lists of the people interviewed for each PA grouping. A list is only provided for the sites in section 7.
4. Page 13. Isn't category 4 at the top of the page for additional sites to be investigated as installation restoration sites? Please clarify. Also, is the recommendation for additional investigations for category 3 intended to be a site inspection level sampling as apposed to remedial investigation sampling?
5. Section 3: This section should include a discussion of screening approaches to evaluating risks at PA/SI sites. Specifically, how the PRGs are to be used for screening risks from site inspection data.
6. Section 5: The recommendations for off-shore areas should also include sampling for contamination.
7. Section 6.1: How were you able to locate the former berms in this area? Can you be certain that you inspected the correct areas? Is there any information on the final disposition of the berms? Would it be most likely that they were just leveled in place?
8. Section 6.3: Since a skeet range would produce a wide dispersal of ordnance material, can you be sure that your survey method was adequate for detecting a concern. How do you account for the fact that no ordnance material was detected on a known skeet range? Did the Navy excavate the area?
9. Section 7 & 8, Recommendations for further investigation under the installation restoration program:

The document needs to make a clearer distinction between a recommendation to investigate sites with a site inspection type of investigation as compared to a full blown remedial investigation for an IR site. These two approaches require substantially different resources. I would also add a third category, investigations for the purpose of conducting a

removal. The third grouping in this document appears to address this category. With these distinctions in mind, I believe that the recommendations for some site groupings are inappropriate. The separate buildings area and the upland magazine area do not present enough of a reason for concern to move beyond the site inspection step as the next level of investigation. These should be put into the third group which is in Table 8-3.

For the transformer houses, this document does not provide a preliminary assessment. As stated on page 131, it does not appear that the documentation has been reviewed to determine whether there is or is not evidence of a release to the environment. The relevant documentation should be reviewed and then the appropriate recommendations made.

10. Section 7: The document needs to distinguish between a problem of contamination that appears to be entirely a building problem from a problem that indicates or suggests the possibility of a release to the environment. The recommendation for building A-173 fails to make this distinction. The document should clearly indicate whether there is evidence of a possible release to the environment. Spills that are entirely in a building are not IR problems but should be addressed through building closure or maintenance. Likewise, the recommendation for building A-49 should distinguish whether the only concern is the floor of the building, or whether there is also a reasonable potential for a release to the environment that should be investigated.

11. Section 7.4.4: I can not find reference to this building in any of the radiation survey plans. Please verify with code 105 the accuracy of the reference to nuclear material storage.

12. Section 8.3: Please clarify what level of site investigation is being recommended. I suggest that this category of sites be titled "Sites Proposed for Site Inspections and Removal Actions." (See also comment 4 and 9.)

13. Section 8.4, Page 150: The sentence third from the bottom suggests that sites in this category were drawn from all four ordnance site groupings. Aren't all the sites in this category only from the ordnance facilities group? Please also include a map that clearly shows the proposed new IR sites. Also, I would suggest that this category of sites be titled as "Sites Proposed for a New Ordnance Production IR Site." (See also comment 9.)

14. Now that we have this information, I would strongly recommend that we consider expanding the IR-22 Record of Decision to an Investigation Area E ROD. I believe that except for the golf course, all other Area E concerns would be covered by this document. A Site Inspection sampling in this area could be conducted and there seems a good chance that no contamination

concerns will be identified. After this relatively modest level of effort we could pursue a ROD for the larger area. It is not my expectation that this comment will be addressed in the revision to this document.